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8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA – NORTHERN DIVISION**

10 THE CINCINNATI SPECIALTY
11 UNDERWRITERS INSURANCE COMPANY

12 Plaintiff.

13 v.

14 RED ROCK HOUNDS, a Domestic Nonprofit
Cooperative Corporation Without Stock (81);
15 LYNN LLOYD, individually; AND TRACY
TURNBOW (Interested Party)

16 Defendants.

17 RED ROCK HOUNDS, a Domestic Nonprofit
Cooperative Corporation Without Stock; and
18 BARBARA LYNN LLOYD,

19 Counterclaimants,

20 v.

21 THE CINCINNATI SPECIALTY
UNDERWRITERS INSURANCE COMPANY;
22 BEEHIVE INSURANCE AGENCY, INC., a
Utah corporation,

23 Counterdefendants.

24 BEEHIVE INSURANCE AGENCY, INC.

25 Third-Party Plaintiffs

26 v.

27 MOORE CLEMENS & CO., INC., a Virginia
Corporation, and DOES I-X, inclusive

28 Third-Party Defendants.

CASE NO.: 3:20-cv-00272-MMD-WGC

**STIPULATION AND ORDER TO
EXTEND TIME FOR PLAINTIFF THE
CINCINNATI SPECIALTY
UNDERWRITERS INSURANCE
COMPANY TO FILE AN AMENDED
COMPLAINT PURSUANT TO COURT
ORDER (ECF No. 55)**

1 AMERICAN RELIABLE INSURANCE
2 COMPANY

3 Intervenor

4 Plaintiff/Counterdefendant, THE CINCINNATI SPECIALTY UNDERWRITERS
5 INSURANCE COMPANY, by and through its attorneys of record, the law firm of LITCHFIELD
6 CAVO LLP, Defendants/Counterclaimants RED ROCK HOUNDS, by and through its attorneys of
7 record, the law firm of Maupin Cox & LeGoy, Counterdefendant/Third-Party Plaintiff, BEEHIVE
8 INSURANCE dba CERTIFIED INSURANCE SERVICES, by and through its attorneys of record, the
9 law firm of Erickson, Thorpe & Swainston, Ltd., Third-Party Defendant MOORE CLEMENS & CO.,
10 by and through its attorneys of record, the law firm of Lewis Brisbois Bisgaard & Smith LLP, and
11 Intervener AMERICAN RELIABLE INSURANCE COMPANY, by and through its attorneys, the law
12 firm of Resnick & Louis, P.C., Defendant/Interested Party, TRACY TURNBOW, by and through her
13 attorneys of record, the law firm of Coulter Harsh Law, and BARBARA LYNN LLOYD, *Pro Se*,
14 (collectively “Parties”), hereby jointly stipulate as follows:

15 1. Plaintiff filed this action on May 7, 2020 naming Tracy Turnbow, Red Rock Hounds,
16 and Lynn Lloyd as Defendants. (ECF No. 1)

17 2. In response to the complaint, Turnbow filed a Motion to Dismiss on July 17, 2021.
18 (ECF No. 10)

19 3. Red Rock filed a Joinder to Turnbow’s Motion to Dismiss on July 22, 2020. (ECF No.
20 14).

21 4. The Court issued an Order on January 6, 2021 granting in part and denying in part the
22 Defendants’ Motion to Dismiss. (ECF No. 55).

23 5. The Order granted Plaintiff leave to file an amended complaint. *Id.*

24 6. The Order granted Plaintiff 15 days, until January 21, 2021, to file its amended
25 complaint.

26 7. Following the Court’s order granting the Motion to Dismiss, the Parties through
27 counsel had discussions about extending the time for Plaintiff to file an amended complaint subject to
28 court approval so the parties could save fees and costs and hopefully resolve this matter and the

underlying matter at mediation which is currently scheduled for March 24-25 with Robert B. Enzenberger.

8. Plaintiff shall have up and until April 9, 2021 to file its amended complaint. April 9, 2021 is 15 days after March 25, 2021;

9. Good cause exists to extend the deadline for Plaintiff to file an amended complaint.

10. The parties are acting in good faith in requesting the court approve this stipulation.

While drafting the instant stipulation, counsel for Defendant Lynn Lloyd ("Lloyd"), Richard Hill, withdrew. Counsel for CSU contacted Lloyd numerous times to sign the instant stipulation. Lloyd repeatedly promised to review the stipulation, but never did so. Counsel for Lloyd, in the underlying state matter but not this case, Charlie Burcham, also contacted and left a message for Lloyd to sign the stipulation. All Parties agree to move forward with the stipulation to protect all their rights, including Lloyd. This agreement is in good faith and not for the purpose of delay.

IT IS SO STIPULATED.

Dated: January 15, 2021

LITCHFIELD CAVO LLP

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Dated: January 15, 2021

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1 Dated: January 15, 2021

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11 Dated: January 15, 2021

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21 *Party Plaintiff Beehive Insurance Agency*

22 Dated: January 15, 2021

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Clemens & Co., Inc.

29 Dated: January 15, 2021

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38 *Attorneys for Intervenor American Reliable*
Insurance Company

1 Dated: January , 2021

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25 Spoke Road
Reno, NV 89506

ORDER

4 Pursuant to the parties' stipulation, **IT IS SO ORDERED** that Plaintiff shall have up to and
5 until April 9, 2021 to file its amended complaint.

7 Dated: _____, 2021

UNITED STATES MAGISTRATE COURT JUDGE